

Narrative Proposal Work-Plan  
EPA Office of Environmental Justice  
Small Grants Program  
Eco Enterprises: Safe Salons  
January 9, 2015

VietAID recognizes that EPA is focused on issues involving climate change resiliency as there is rising awareness of climate change impacts by both national and international bodies, including the White House. A key focus of climate resilience efforts must be more than climate adaptation and resiliency; it must include appropriate workforce development and mitigation of existing environmental hazards. Particularly vulnerable to climate change consequences are lower income and disadvantaged communities. We believe our proposal addresses a need in our community which is going unmet and is linked to the need for education about environmental hazards, workforce retraining, and climate change.

**I Project Title and Purpose Statement**  
**Eco Enterprises: Safe Salons**

General Problem: The use of toxic chemicals in the nail salon industry in the Greater Boston area has expanded exponentially in recent years, posing great health risks for workers, consumers, and the general public; polluting both air and water supplies of the community and negatively affecting the health of those working in the nail salon industry.

The goal of our project, **Eco Enterprises: Safe Salons** is to significantly reduce, and ultimately eliminate, the widespread use of dangerous, toxic chemicals in the nail salon industry and to create safer work environments for salon owners and technicians, consumers, and the general public in the Boston, Massachusetts area. The project proposes to educate, train, and assist salon owners to become more viable, profitable, and sustainable “green certified” businesses.

The project will serve greater Boston, including zip codes 02122; 02116; 02130; 02117; and others, as shown on the attached map. The reach of the project will include a number of Boston suburbs where Vietnamese owned and operated nail salons are located. It will serve businesses located in two congressional districts and multiple counties as listed in the map attachment.

**The project is designed to address problems as outlined in the Clean Water Act, Section 104 (b)(3); the Clean Air Act, Section 103 (b)(3); and the Toxic Substances Control Act, Section 10(a).**

VietAID, Inc. (The Vietnamese-American Initiative for Development, Inc.) has partnered with the You Help Foundation, Inc., a private foundation based in Boston focused on community problems; The Massachusetts Nail Salon Association and Boston College to address the pressing environmental and health problems created by a rapidly expanding and largely unsupervised and unregulated nail salon industry in Massachusetts. Other partners in the Eco Business Development Collaborative include Brandeis University and the Boston Public Health Commission which has provided much of the health data used to help measure the health risks of nail salon workers due to toxic and dangerous chemicals used in the salons.

## II Environmental and Public Health Information About the Affected Community

VietAID targets and primarily serves the Vietnamese community in Greater Boston. The Vietnamese community has been characterized by rapid growth, increasing 128% between the 1990 and 2000, the fastest growing ethnic group in the city of Boston which has the largest concentration of Vietnamese in the Greater Boston area. It is estimated that almost 35,000 Vietnamese live in Greater Boston, with the majority living in Dorchester, a disadvantaged, low income neighborhood within the City of Boston. Most of Dorchester's Vietnamese residents live in the Fields Corner neighborhood and almost all Vietnamese adults are first generation immigrants and refugees who have low educational attainment, speak no or limited English, and have few transferrable job skills. The below chart show some of the demographics of this unique community.

### Profile Vietnamese Community in Greater Boston.

**Vietnamese Population** 34,086  
**Foreign-Born** 70.6%  
**Entered US in 2000 or more recently** 34.1%  
**Not a US citizen** 36.1%  
**Speak a language other than English at home** 83.7%  
**Speak English less than "very well"** 71%  
**Did not complete high school** 27.1%  
**Per capita income** \$22,330  
**Households at or below poverty level** 38%  
**Source: American Community Survey Public Use Microdata Sample (ACS PUMS), 2006-2008**

It is estimated that a majority of the Vietnamese-owned businesses in Greater Boston concentrate in hardwood floor finishing and nail salon sectors. These businesses provide employment for thousands of Vietnamese men and women ages between 18 and 40, most of whom have limited language and job skills and limited formal education. The nail salon industry is dominated by female Vietnamese technicians and owners. The industry has experienced phenomenal growth in the past 15 years. As shown in the below table, from 1991 to 2005, the number of nail salons has increased by 412% and the number of registered manicurists has increased by 428% in Massachusetts. The numbers have continued to grow and are currently being updated.

### Nail Salons and Technicians in Massachusetts and the US

State	1991	2005	Growth	1991	2005	Growth
Massachusetts	290	1,485	412%	2,219	11,708	428%
U.S. TOTAL	26,752	57,830	116%	113,934	380,635	234%

Source: Nails Factbook.

Vietnamese immigrants open and operate nail salons because of low start-up costs, low language skill requirements, proven successes of other businesses in these sectors, and the existence of

Vietnamese networks of business and social support. During the eighties and nineties, these businesses offered great source of income and employment for many immigrant families. But over the past decade, these businesses have faced numerous challenges that have forced many businesses to either shut down their operations or see their profits dramatically plummet.

Because of the low start-up costs, few regulations, and low pay with no benefits, Vietnamese nail salons have flourished using low-cost business strategies; i.e., offering the same service for a lower price in a very competitive market. In three decades, the low barriers to entry have brought an onslaught of new competing businesses that are clustered in the same geographic area, offer similar services for a lower and lower price, and compete for the same consumer base.

**In order to maintain their already low profit margins, many survive by using cheap, and in many cases, illegal and dangerous chemicals that are highly toxic, providing few protections for their workers or owner-workers, and offering few benefits, if any. Significant health problems have been identified by the operators and technicians in local nail salons by many public health and academic studies. Additionally, a Boston Globe article of 2/13/2014 identifies some of the significant health problems that this project is attempting to address.**

### **III Organization's Historical Connection to the Affected Community**

VietAID is a community-based organization with open membership. Members are encouraged to participate in the business and social meetings of the organization, elect and remove board members, and offer for board membership and leadership positions. VietAID's board currently has thirteen members who set policies and oversee staff-directed operations. Most board members are either tenants in VietAID's affordable housing communities, live in the low-income Dorchester neighborhood where Viet Aid's offices are located, or have been active members in the Vietnamese community. VietAID's staff reflects the same commitment to the organization's mission as its Board and the staff offers a wide range of professional expertise and history of public and community service. VietAID's immediate past executive director is an immigrant from Viet Nam and has more than 30 years of working experience in organizational development, program development, and fundraising. In recognition of his work at Viet Aid, Governor Charlie Baker mentioned him in his inaugural address of January 8, 2015 and appointed him Assistant Secretary of Housing and Economic Development for the Commonwealth of Massachusetts beginning January 9, 2015. He is still involved with the organizations but has been replaced by an interim director, a practicing attorney with extensive experience with the Robert Wood Johnson Foundation who will serve while a national search is conducted by the board for a permanent director. The agency's management has diverse backgrounds in social work, housing development, and public health, and have worked extensively with the Vietnamese community in the U.S. and in Vietnam. VietAID support staff includes five members who are Dorchester residents, one of whom is also a former welfare recipient, whose background and experience invaluable contribute to the agency's insight, effectiveness, and success serving the larger community, many of whom are not Vietnamese. Inclusiveness is the hallmark of every project undertaken by VietAID where those being served are actively recruited for leadership and participatory positions in every project.

VietAID has several on-going partnerships that are strong and mutually beneficial. As an active member of the community business network, clients are referred to Dorchester Bay EDC for small business loans. As described above, VietAID has worked closely with various non-profit agencies, Public Health Commissions, and researchers on our nail salon initiative. One of Viet AID's strongest partners, the Boston Public Health Commission, plays a significant role in the implementation of our on-going Eco Enterprise Development endeavor. The Boston Public Health Commission helps with the selection of the business partners, certifying these partners, and planning for the implementation of a Green Business Network.

Most importantly, VietAID is an integral part of the Fields Corner-Dorchester community having developed most of its affordable housing and actively attacked the declining business climate in Dorchester with an infusion of rehabilitated office and retail buildings. Its historical ties to the Vietnamese community in Dorchester is unmatched with its community center, the heart of all community activity for Vietnamese in Boston. Because VietAID has a strong presence in Dorchester and is a central clearing house for all matters affecting the Vietnamese community, its leadership in providing guidance to nail salon operators and technicians has been readily accepted. VietAID maintains strong connections to the Vietnamese community by operating a variety of pre-school and after school programs, as well as, elderly and senior services, including affordable housing, that touch almost every segment of the Vietnamese community and every Vietnamese family in the area. Hundreds of Vietnamese owned businesses have traditionally relied upon VietAID for sound business advice and assistance in loan packaging, licensing, and employee recruitment and training activities. VietAID also sponsors GED classes and often assists in locating employment opportunities for those requesting help. It also offers a variety of social services to the disadvantaged community assisting with such things as helping pay utility bills to limited legal advice for those needing help in critical situations.

#### **IV Project Description**

Over the past few years, the low-cost business strategy used by the majority of Vietnamese nail salon owners and operators has become unsustainable for several key factors. First, the profit margins have become razor thin, making it impossible for the businesses to lower their pricing any further. Second, the costs of doing business have increased substantially due to new regulations, higher consumer and worker awareness, and higher demands for safer and healthier working environments. Many cities in Greater Boston have passed new health and safety regulations that require nail salon to secure new permits and licenses, provide better training and protection for their workers and consumers, ban cheap and highly toxic products, and enforce wage laws that require employers to pay minimum wages, with benefits to their workers. Third, workers and consumers have become aware of the health threats and demanded safer and healthier working environments as there is a new societal awareness of the need for "greening" the planet and slowing global climate change.

Research conducted by academics from Boston College and Brandeis University, as well as the Boston Public Health commission, concludes that the Vietnamese businesses, with guidance and help, could successfully reposition their businesses to capture market opportunities created in the emerging green economy. Due to the new health and safety regulations and increased consumer

awareness, Vietnamese nail salons must implement a new business strategy to brand their business as a green nail salon that provides a safe and healthy environment for their workers and consumers, offers toxic-free and other green products, and emphasizes highest customer service. Surveys by VietAID, the Health Commissions and Nails Magazine find that consumers are willing to pay higher fees for “healthy and safe environment, green products and services and good customer service.”

Our research, based on salon survey data collected over a period of two years and designed in collaboration with salon owners and employees, and our collaborative partner, the Massachusetts Nail Salon Association, further indicates strong interest from the Vietnamese nail salons in pursuing business opportunities created by the emerging green economy. The survey identifies the need to develop skills and business training to acquire knowledge and assistance to start and/or reposition their existing businesses. There is a strong need to achieve green certification, develop and implement a marketing strategy using social media, raise capital to purchase equipment, and obtain assistance to identify and secure contracting opportunities.

VietAID and its collaborating partners request funding to support Eco Enterprise Development to help nail salon businesses achieve stabilization and growth by planning and implementing new business strategies to access market opportunities in the emerging green economy. From September 2015 through August 2016, VietAID will pilot this strategy with 30 lead businesses and attempt to reach all others in the nail salon industry through various forms of media designed to educate operators and technicians about a better business model that incorporates safe practices and reduced negative environmental impact on the health of the community. Through a representative process, we will select up to 30 business partners to participate in the program as lead businesses. The business partners will receive at least 12 hours of group training, more than 30 hours of one-on-one business counseling, and on-going and continuous networking and peer support. By the end of the program, the business partners will have planned and implemented a new business strategy to achieve business stabilization and growth for their own businesses and others similarly situated which may want to participate in the program.

VietAID will select thirty (30) business partners (*15 business partners during each six-month cycle*) through an open and fair “Request for Partners” process. We will develop an “RFP” package, which will outline priorities, specific obligations, and requirements for nail salon businesses seeking to become collaborative partners in improving the environment and success of nail salons in Boston. The most significant of these priorities, obligations, and requirements are: small business with 20 or fewer workers; commitment to achieve green certification; commitment to work together with other business partners to market and brand green business model; obligation to commit required time; and commitment to collect data such as the number of new and repeat customers, the number of customers willing to pay higher fees for green services & products, higher retention and customer rates for program success measurement; and commitment to provide other data and information needed for quarterly, annual and final reports to funders.

VietAID will make announcements and subsequently distribute “Request for Partners” (RFP) to all nail salon businesses located in the target area of Greater Boston. Specifically, we will send announcements using our data base containing a listing of every nail salon in our area, in

Vietnamese language print and will also use electronic media and VietAID's website to reach salon owners and technicians potentially interested in the project. We will conduct at least three after regular work hours orientations and workshops to explain the RFP requirements and provide post-workshop technical assistance to assist businesses that are interested in participating to prepare their application. Proposals will be evaluated and selected by a panel consisting of VietAID staff, representatives from the Boston Public Health Commission and other members of our collaborative, based on the established priorities and requirements.

The business partners will participate in four, 3-hour group workshops, which will focus on helping the partners understand how to tackle some of the most challenging parts of their businesses— changing customer base and market needs, product and pricing, customer service, marketing, etc. They will also learn about market opportunities in the merging green economy and how they can capture these new market opportunities by becoming certified green businesses. They will learn about alternatives to the use of the harsh chemicals currently in use and will also learn how they can leverage technology to brand and market their services as green; a label particularly popular among Boston's enlightened, progressive, and generally better educated population. These workshops will be conducted by members of the Eco Enterprise Development collaborative partners.

VietAID will provide at least 30 hours of one-on-one business counseling to help each business partner complete business planning, create a business plan and execute their business plan to achieve stabilization and growth. One-on-one business counseling will cover five key areas: (a) Understanding and achieving green certification for their business (using Green Standards Checklist developed jointly by VietAID and our Eco Enterprise Development Collaboration which includes owners and technicians, as well as, representatives of the private sectors, academia, and the public health service; (b) training workers to improve customer service; (c) developing a marketing strategy to brand and market new green business services using social media marketing; (d) packaging loan requests for a business loans to finance their business stabilization, clean up from toxic chemicals, and growth if needed; and (e) improving business systems such as inventory management, accounting, etc. Infused in all of these endeavors will be the emphasis on the dire necessity for every salon to become a certified "green" business eliminating hazards to workers, consumers, and the general population.

VietAID will provide technical assistance and support to help the business partners develop and implement a "Green Business Network." The purpose of the Network is to help promote the business partners using testimonials from the Health Commissions and customers. It will also help rebrand Vietnamese nail salon businesses as high quality and environmentally friendly businesses, supplanting the cheap and low-cost business image. The Network will develop a web site that lists and promotes the business partners that have achieved green certification. It will list articles, studies, testimonials, etc. that inform consumers that most of the chemicals used in nail salons are hazards to the public and salon workers, the availability of safer and effective alternatives, and an appeal to the public to ask for those alternatives (or go to the web site to select businesses that offer them) when they purchase services. The website will be linked to the websites of the eco business partners where consumers can find out more information about their products and services. The website will also be linked to public agencies such as the Boston Public Health Commission where consumers can find information on the hazards of the

chemicals being used and alternative safe and healthy products and services.

## **V Organizational Capacity and Programmatic Capability**

Founded in 1994, VietAID is the first grassroots community development corporation founded and operated by Vietnamese immigrants in the U.S. Located in Boston's Fields Corner neighborhood, VietAID's mission is to build a strong Vietnamese American community in Boston and a vibrant Field's Corner neighborhood. Over fifteen years, VietAID has worked with mainstream organizations and long-time residents to improve the lives of hundreds of Vietnamese immigrants; increase the participation of Vietnamese residents in civic life; revitalize the once blighted Fields Corner residential area; and contribute to the economic vitality of the neighborhood.

VietAID serves all, but targets the Greater Boston Vietnamese community. Of the over 35,000 Vietnamese residing in Greater Boston, more than 10,000 of direct Vietnamese descent live in Dorchester, one of the poorest Boston neighborhoods. Thirty-eight percent (38%) of the Vietnamese families in our geographic area live below the poverty line. In a recent VietAID survey of Vietnamese residents in Dorchester, 71% of respondents said they had little or no verbal skills in English. Due to low educational attainment, lack of transferable job skills, and limited English proficiency, Vietnamese immigrants typically work in low-paying jobs and hazardous work environments without career advancement opportunities. To escape poverty and build economic security for their children, a majority of Vietnamese immigrants choose self-employment. This is manifested in the growth of Vietnamese-owned small businesses, which numbered from only a few in the early 1980's to over 1000 businesses in the nail salon, hardwood floor, and ethnic specialty store sectors in Greater Boston today.

VietAID's outreach strategy is linguistically and culturally appropriate and targets Vietnamese low-income families and businesses in Greater Boston. The strategy includes weekly advertisements in two Vietnamese language newspapers; distribution of bilingual flyers and brochures at Vietnamese businesses and non-profits organizations that serve low-income Vietnamese families; direct mailing to Vietnamese businesses using our mailing list; and interviews and public service announcements on the weekly VietAID TV program. VietAID also hosts a series of regular community events and cultural celebrations to reinforce cultural identity and maintain close ties to the general population of the community.

To help low-income Vietnamese achieve economic security and to build and accumulate wealth, VietAID for over 20 years has pursued a sectorized business development strategy to assist low-income Vietnamese start a new business in a different sector or to assist an existing business stabilize and grow by accessing new markets. The strategy consists of the following sequential steps: 1) Conduct market analysis to identify new business opportunities or new markets for existing businesses; conduct business training to give an overview of business or market opportunity; provide post-training one-on-one business counseling, which includes business planning, loan packaging, marketing, operational improvement, etc.; and provide on-going post startup or stabilization support such as accessing contracting opportunities, marketing, etc. VietAID has partnered with many other community organizations on a variety of worthwhile

projects and has a demonstrated commitment to providing technical assistance, training, loan packaging to the small Vietnamese-owned businesses, as well as in depth experience in these areas. In fact, VietAID was previously funded by the EPA to reduce toxin use by the hardwood floor industry in Boston, the majority of which businesses are owned by Vietnamese operators.

Throughout its many years of existence, VietAID has enjoyed widespread community support and has received funding from many sources, both public and private. It is also a United Way agency subject to the audit process and monitoring of this agency. It has been scrupulous in the expenditure of its funds and keenly aware of its responsibility to spend scarce resources wisely. Its financial statements are audited annually and all of its records are available for public inspection at any time. In addition to HUD funding for its affordable housing and retail projects, VietAID has in the past been funded by EPA to help reduce the use of toxic chemicals in the floor refinishing industry and has been recognized and honored for its efforts in this endeavor.

## **VI. Ties to the Community and Qualification of the Project Manager (PM)**

VietAID has formed a highly skilled and committed staff and consulting team to work on the Safe Salons initiative. The proposed team members are:

Project Manager –Tom Brogan- ESOL Teacher. Under the supervision of the senior Business Consultant, Tom will be responsible for conducting outreach and recruitment, intake and assessment, coordinating training workshops, assisting the senior Business Consultant with one-on-one counseling, and coordinating the Green Business Network. Tom has thirty years of experience as a teacher and is currently teaching English to primarily Vietnamese immigrants. providing group and one-on-one counseling to help low-income Vietnamese build and accumulate wealth through housing and small business counseling. He is a resident of the Dorchester community and has personal experience in developing several small businesses. He will be assisted in this effort by several board members with significant business development experience and by consultants from the Debt to Assets organization which has assisted small business owners with debt and credit counseling for over twenty years.

## **VII Past Performance on Reporting Outputs and Outcomes**

Since 2003 a major initiative of VietAID's economic development agenda is our effort to help nail salon businesses stabilize and grow and promote the occupational health and safety of the workers. Over the past 9 years, VietAID has partnered with various partners, including the Dorchester House Community Health Center, researchers at the University of Lowell, Boston College, Brandeis University, The You Help Foundation, Inc., New Ecology, MassCosh, and the Boston Public Health Commission to plan and implement various programs and efforts. To date, VietAID and our partners in our Eco Business Development collaborative have achieved the following outcomes and impact: (i) Passed new regulations at the City of Boston and State levels to improve the health and safety of workers and consumers; (ii) Provided health and safety training to over 1000 workers and owners; (iii) Developed green standards for nail salons that include best practices and alternative safe products; (iv) Increased consumer awareness about the health hazards facing workers, owners and consumers in most products being used by nail salons



and (v) Completed research to identify opportunities for nail salon businesses to achieve stabilization and growth.

The standard evaluation plan used by VietAID to measure its success with each project or program is designed to learn what the program accomplished and why it succeeded or failed to achieve its intended outcomes. Since the program seeks to help existing businesses develop and implement a new business strategy to achieve stabilization and growth, VietAID seek to measure two key measures of progress and final outcomes:

- **Progress Outcome:** At least twenty four (24) businesses completed and executed business plans to achieve stabilization and growth. Measures include completion of 12-hours business training, completion of business plan, or completion of a loan application to convert their existing business to a green certified operation.
- **Final Outcome:** At least twenty (20) businesses achieved business stabilization and/or growth. Measures for business stabilization include: Achieve green certification, better customer service, or creating website and other social media marketing means; Measures for business growth include: Increased revenue & profit margins; higher fees and demand for green products/services; higher customer retention rate; and number of new customers.

Progress outcomes will be measured and documented every six months during the grant period. Final outcome will be measured and documented at the end of the grant period. The evaluation will rely on a combination of key informant interviews and participant surveys to measure program outcome and impact. Surveys will include questions that ask participants to report their progress toward completing business training, business plan, marketing plan or business loan application. Surveys will also include questions on number of new customers, fees paid for green service, consumer demand for green services, and number of customers who return because of higher satisfaction. Key informants will be asked to evaluate and whether they are willing to pay higher fees for green business practices and products.

These are some of the other successful projects of VietAID:

**Family Child Care System (1997-Present):** VietAID launched the Family Child Care System in 1997 to help low-income Vietnamese women become financially self-sufficient, while strengthening their community by providing affordable and quality child care. Since its inception, the System has conducted business training for 107 women participants; provided post-training one-on-one business counseling that helped 18 women start and operate home-based day care businesses; provided on-going back office support and access to child care contracts; and provided quality and affordable child care to over 300 low-income families.

**Win-Win Marketing Cooperative (2002-2006):** Win-Win Marketing Cooperative consists of cleaning microenterprises owned and operated by business owners. These small businesses are supported by Win-Win, which acts as the marketing, contracting, and accounting agent for the small businesses. From 2002-2006, Win-Win provided training to over 30 participants and helped start 7 cleaning businesses.

Nail Salon/Hardwood Floor/Green/Eco-Enterprises (2003-present): Since 2003, one of VietAID's key business development initiatives is to help Vietnamese nail salon and hardwood floor finishing businesses stabilize and grow through research, education, business training, and one-on-one counseling. VietAID's work in this area was recognized by the EPA which helped fund part of this initiative.

## **VIII Expenditure of Awarded Grant Funds**

Funds received from this grant will be used to employ full time staff to work closely with our collaborative partners to involve all member of the nail salon industry in Greater Boston in achieving maximum operational safety while meeting state and local standards designed to convert each business into green certified businesses. The budget takes into account the need to attend EPA sponsored workshops and allows for grants to assist with transportation and other costs of participating salon owners and workers to attend local workshops and training sessions.

Funds will be strictly accounted for and audited on an annual basis by certified accountants. VietAID has extensive experience in the management of funds. In fact, its chief operating officer has served as a bank officer at several prominent national and international banks and is familiar with standard accounting procedures and program budgeting.

## **IX Quality Assurance Project Plan (QAPP) Information**

There already exists extensive data about the health problems created by the use of toxic substances in the nail salon industry and poor equipment and working environments in the salon industry generally. There will be, however, a need to measure and update this data as the project progresses to determine what impact, if any, the projects efforts are having in producing a positive impact from the greening of the salon industry. Survey and measurement instruments that have been used in the past can be used again and likely will be to help measure our success.